## IN THE

## Supreme Court of the United States

SOUTH DAKOTA,

PETITIONER,

v.

WAYFAIR, INC., OVERSTOCK. CO, INC. AND NEWEGG, INC.

RESPONDENTS.

## CERTIFICATE PURSUANT TO RULE 33.1(h)

I, Alan B. Morrison, counsel of record for Four United States Senators, do hereby certify, pursuant to Rule 33.1(h), that their brief amicus curiae contains 5416 words, including footnotes, excluding the portions set forth in Rule 33.1(d).

Alan B. Morrison